

1 THE HONORABLE JAMES L. ROBART  
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IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 ANNA PATRICK, DOUGLAS MORRILL,  
10 ROSEANNE MORRILL, LEISA  
11 GARRETT, ROBERT NIXON,  
12 SAMANTHA NIXON, DAVID  
13 BOTTONFIELD, ROSEMARIE  
14 BOTTONFIELD, TASHA RYAN,  
15 ROGELIO VARGAS, MARILYN DEWEY,  
16 PETER ROLLINS, RACHAEL ROLLINS,  
17 KATRINA BENNY, SARA ERICKSON,  
18 GREG LARSON, and JAMES KING,  
19 individually and on behalf of all others  
20 similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;  
HAPPY HOUR MEDIA GROUP, LLC, a  
Washington limited liability company; THE  
LAMPO GROUP, LLC, a Tennessee  
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

STIPULATED MOTION AND [PROPOSED]  
ORDER EXTENDING CASE SCHEDULE AND  
CLASS CERTIFICATION DEADLINES

Noted: June 11, 2024.

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26 STIPULATION AND [PROPOSED] ORDER EXTENDING  
CASE SCHEDULE AND CLASS CERTIFICATION  
DEADLINES

Case No. 2:23-cv-00630-JLR

MORGAN, LEWIS & BOCKIUS LLP  
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1 Plaintiffs Anna Patrick, Douglas Morrill, Roseanne Morrill, Leisa Garrett, Robert Nixon,  
 2 Samantha Nixon, David Bottonfield, Rosemarie Bottonfield, Tasha Ryan, Rogelio Vargas,  
 3 Marilyn Dewey, Peter Rollins, Rachel Rollins, Katrina Benny, Sara Erickson, Greg Largson, and  
 4 James King (“Plaintiffs”) and Defendants David L. Ramsey III and the Lampo Group, LLC  
 5 (“Lampo Defendants”) and Happy Hour Media Group, LLC (“Happy Hour”) (collectively, the  
 6 “Parties”), hereby STIPULATE and AGREE, and so jointly move the Court, as follows:

7 WHEREAS, the Court issued an Order on February 21, 2024 (Dkt. No. 71), setting the  
 8 following deadlines:

- 9 • Deadline for Plaintiffs’ disclosure of experts upon whom they may rely in connection  
   with class certification: August 16, 2024
- 10 • Deadline for Defendants’ disclosure of experts upon whom they may rely in connection  
   with class certification: October 4, 2024
- 11 • Deadline for Plaintiffs’ disclosure of rebuttal experts upon whom they may rely in  
   connection with class certification: October 25, 2024
- 12 • Deadline for motions relating to admissibility of experts on issues pertaining to class  
   certification: January 10, 2025
- 13 • Deadline for dispositive motions or motions to compel arbitration that any party  
   believes are likely to affect class certification: January 10, 2025
- 14 • Deadline for responses or oppositions to motions relating to admissibility of experts on  
   issues pertaining to class certification and/or dispositive motions or motions to compel  
   arbitration that any party believes are likely to affect class certification: February 10,  
   2025
- 15 • Deadline for replies regarding motions relating to admissibility of experts on issues  
   pertaining to class certification and/or dispositive motions or motions to compel  
   arbitration that any party believes are likely to affect class certification: February, 28  
   2025

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 22 WHEREAS, the Lampo Defendants will shortly move this Court to compel arbitration as  
 23 to those plaintiffs who have produced contracts containing arbitration clauses, and at this time the  
 24 parties are working cooperatively to complete the first phase of discovery and schedule  
 25 depositions, if the Court denies the motion to compel arbitration (and without prejudice to  
 26 Defendants’ right to request a stay of all such proceedings pending arbitration);

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1           WHEREAS, the Parties have conferred and agree that in light of the status of the litigation  
 2 at this stage, good cause exists to extend the existing case deadlines;

3           WHEREAS, the Parties agree that the Court should extend the existing case schedule and  
 4 set the following deadlines at this stage of litigation, without prejudice to any party's right or ability  
 5 to seek a stay pending any request for arbitration or other revisions to the case schedule in the  
 6 future:

- 7           • Deadline for Plaintiffs' disclosure of experts upon whom they may rely in connection  
              with class certification: November 21, 2024
- 8           • Deadline for Defendants' disclosure of experts upon whom they may rely in connection  
              with class certification: January 17, 2024
- 9           • Deadline for Plaintiffs' disclosure of rebuttal experts upon whom they may rely in  
              connection with class certification: February 14, 2024
- 10          • Deadline for motions relating to admissibility of experts on issues pertaining to class  
              certification: April 25, 2025
- 11          • Deadline for dispositive motions or motions to compel arbitration that any party  
              believes are likely to affect class certification: April 25, 2025<sup>1</sup>
- 12          • Deadline for responses or oppositions to motions relating to admissibility of experts on  
              issues pertaining to class certification and/or dispositive motions or motions to compel  
              arbitration that any party believes are likely to affect class certification: May 30, 2025
- 13          • Deadline for replies regarding motions relating to admissibility of experts on issues  
              pertaining to class certification and/or dispositive motions or motions to compel  
              arbitration that any party believes are likely to affect class certification: June 20, 2025

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 15          WHEREAS, the Parties further agree that the following deadlines should remain in effect,  
 16 as ordered (*see* Dkt. Nos. 54 & 71), without prejudice to any party's right to seek a stay of such  
 17 deadlines pending arbitration:

- 18           • Deadline to complete discovery on class certification: 30 days after expert motions and  
              dispositive motions or motions to compel arbitration affecting class certification are  
              decided by the Court

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 26          <sup>1</sup> As referenced above, the Lampo Defendants anticipate filing a motion to compel arbitration near-term, rather than  
              waiting until the stipulated deadline, having recently learned that many of the named Plaintiffs have arbitration  
              agreements.

- 1       • Deadline for Plaintiffs to file motion for class certification: 60 days after expert motions  
2           and dispositive motions or motions to compel arbitration affecting class certification  
3           are decided by the Court

4           THEREFORE, the Parties stipulate and jointly move the Court for an order setting the  
5           deadlines as set forth above. This stipulation is made without prejudice to any party, individually  
6           or collectively, to seek extension of the deadlines herein, as litigation continues.

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STIPULATION AND [PROPOSED] ORDER EXTENDING  
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1 STIPULATED TO this 11<sup>th</sup> day of June, 2024.

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26 STIPULATION AND [PROPOSED] ORDER EXTENDING  
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1                   **[PROPOSED] ORDER**

2                   IT IS SO ORDERED.

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4                   DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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7                   THE HONORABLE JAMES L. ROBART  
8                   UNITED STATES DISTRICT JUDGE